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T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

1.0 PRE-REMEDIAL

1. 8 Preliminary Assessment Documents

 Potential Hazardous Waste Site - Preliminary Assessment, Joe Young, EPA Region IV, for J. E. Downey, State of Alabama Department of Environmental Management. (August 06, 1987) Preliminary Assessment for Thompson-Hayward Site (e.g., T.H. Agriculture & Nutrition Company, Inc.).

2.0 REMOVAL RESPONSE

2. 1 Correspondence

 Cross Reference: Letter from Charles Eger, EPA Region IV, to Bill Welch, Industrial Chemical. (August 04, 1992) Concerning potential problems noted during site inspection made July 15, 1992. [Filed and cited in Entry Number 2 of 13. 1 COMMUNITY RELATIONS - Correspondence]

2. 8 Removal Response Reports

1. T. H. Agriculture & Nutrition Company Site Cleanup, James Jonathan Dow, PE LaMoreaux and Associates. (DATE UNKNOWN) Summary of removal action carried out in 1981 for TH Agriculture under the supervision of the State of Alabama.

3.0 REMEDIAL INVESTIGATION (RI)

- Letter from F. Lawrence Oaks, Alabama Historical Commission, to Alan Yarbrough, EPA Region IV. (August 21, 1991) Concerning possible need for conducting cultural resource assessment on areas previously undisturbed where site remedial work will be taking place.
- 2. Letter from Alan Yarbrough, EPA Region IV, to Greg Rhinehart, Alabama Historical Commission. (September 05, 1991) Concerning reply to letter of August 21, 1991, providing information regarding need for a cultural resource assessment.
- Letter from F. Lawrence Oaks, Alabama Historical Commission, to Alan Yarbrough, EPA Region IV. (September 18, 1991) Determines that proposed remedial activities at the site will not impact historic sites or structures.
- Letter from Bertrand Thomas, PRC Environmental Management, Inc., to Alan Yarbrough, EPA Region IV. (March 11, 1992) Summarizes meeting held February 26, 1992, to present the Preliminary Site Characterization Summary.
- Letter from Alan Yarbrough, EPA Region IV, to Justin Martindale, State of Alabama Department of Environmental Management. (May 14, 1993) Summarizes meeting held May 13, 1993.
- 6. Letters from Alan Yarbrough, EPA Region IV, to Justin Martindale, State of Alabama Department of Environmental Management; Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA); James Lee, US Department of the Interior; James Martin, Alabama Department of Conservation and Natural Resources; and Ernest Mancini, State Geologist. (May 19, 1993) Invitation to participate in ecological site visit.
- 7. Letter from James Lee, US Department of the Interior, to Alan Yarbrough, EPA Region IV. (May 21, 1993) Concerning site visit planned for June 8, 1993.
- 8. Letter from Joseph Downey, State of Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. (May 25, 1993) Concerning participation of state in RI/FS process.

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3.0 REMEDIAL INVESTIGATION (RI)

3. 2 Sampling and Analysis Data

- Verified Sampling Data, Chain of Custody Forms and Quality Assurance and Quality Control Documents related to Verified Sampling Data are currently located at EPA Region IV Environmental Services Division, Athens, Georgia. Such documentation will be made available for review upon request sent to the Remedial Project Manager for the T H Agriculture & Nutrition Company, Inc. (Montgomery, Alabama) Superfund Site, Region IV, U.S. EPA, 345 Courtland Street, Atlanta, Georgia 30365. (DATE UNKNOWN)
- Cross Reference: "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama; Volume II, Appendix A; Field Sampling and Analysis Plan; AOC No. 91-20-C; (Final)," Eckenfelder Inc. for Atochem. (July 1991) [Filed and cited in Entry Number 7 of 3. 4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]
- Memorandum from John McConney, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV. (September 18, 1992) Evaluation of split sample and QC data for three soil and five groundwater samples collected October - December 1991.
- 4. Memorandum from John McConney, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV. (September 23, 1992) Evaluation of split sample and QC data for one soil and two groundwater samples collected January 1992.
- Memorandum from John McConney, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV. (October 07, 1992) Evaluation of split sample data for two surface water samples collected May 1992.
- 6. Memorandum from Gary Bennett, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV. (October 26, 1992) Evaluation of split sample and blind QC data for two groundwater samples collected March 1992.
- 7. Letter from Dale Showers, Eckenfelder, to Alan Yarbrough, EPA Region IV. (June 25, 1993) Elf Atochem proposal for additional sediment sampling.
- 8. Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Alan Yarbrough, EPA Region IV. (July 06, 1993) Comments on proposal for additional sampling.
- Letter from Dale Showers, Eckenfelder, to Alan Yarbrough, EPA Region IV. (July 22, 1993) Work
 plan for installation of deep monitoring wells.
- Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Elf Atochem. (July 28, 1993)
 Comments on proposal for additional sediment sampling.
- Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Elf Atochem. (July 29, 1993)
 Transmits comment to be incorporated into work plan for installation of deep monitoring wells.
- Memorandum from Kay Wischkaemper, EPA Region IV, to Alan Yarbrough, EPA Region IV. (July 29, 1993) Comments on the work plan for installation of deep monitoring wells.
- 13. Letter from Dale Showers, Eckenfelder, to Alan Yarbrough, EPA Region IV. (July 30, 1993) Revised work plan for installation of deep monitoring wells.

3. 4 Work Plans and Progress Reports

1. Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (May 15, 1991) Transmits Progress Report No. 1.

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3.0 REMEDIAL INVESTIGATION (RI)

3. 4 Work Plans and Progress Reports

- Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (June 14, 1991)
 Transmits Progress Report No. 2.
- 3. Letter from John P. Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. Concerning general comments on the RI/FS Project Plan. (June 17, 1991)
- Letter from John P. Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. Concerning detailed comments on the RI/FS Project Plan - THAN Superfund Site and Adjacent Property. (June 18, 1991)
- 5. Letter from Alan Yarbrough, EPA Region IV, to Samuel Balamoun, Atochem. (June 28, 1991) Disapproves RI/FS Work Plan; provides comments.
- "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama; Volume I; Work Plan; AOC No. 91-20-C; (Final)," Eckenfelder Inc. for Atochem. (July 1991)
- 7. "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama; Volume II, Appendix A; Field Sampling and Analysis Plan; AOC No. 91-20-C; (Final)," Eckenfelder Inc. for Atochem. (July 1991)
- "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property;
 Montgomery, Alabama; Volume III, Appendix B; Quality Assurance Project Plan; AOC No. 91-20-C;
 (Final)," Eckenfelder Inc. for Atochem. (July 1991)
- "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property;
 Montgomery, Alabama; Volume IV Appendix C; Health and Safety Plan; AOC No. 91-20-C; (Final),"
 Eckenfelder Inc. for Atochem. (July 1991)
- Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (July 12, 1991)
 Transmits Progress Report No. 3.
- 11. Letter from Alan Yarbrough, EPA Region IV, to Samuel Balamoun, Atochem. (August 07, 1991) Conditionally approves revised RI/FS Work Plan.
- 12. Letter from John Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. (August 09, 1991) Transmits comments of TH Agriculture to the revised Work Plan.
- 13. Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (August 12, 1991) Concerning requested revisions to RI/FS Work Plan.
- 14. Letter from Alan Yarbrough, EPA Region IV, to Douglas Loutzenhiser, Atochem. (August 13, 1991) Responds to TH Agriculture comments dated August 9, 1991, to revised Work Plan.
- Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (August 15, 1991)
 Transmits Progress Report No. 4.
- Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (September 13, 1991)
 Transmits Progress Report No. 5.
- 17. Letter from Samuel Balamoun, Atochem, to Alan Yarbrough, EPA Region IV. (October 14, 1991) Transmits Progress Report No. 6.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (November 14, 1991)
 Transmits Progress Report No. 7.

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T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

3.0 REMEDIAL INVESTIGATION (RI)

3. 4 Work Plans and Progress Reports

- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (December 17, 1991)
 Transmits Progress Report No. 8.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (January 15, 1992)
 Transmits Progress Report No. 9.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (February 14, 1992)
 Transmits Progress Report No. 10.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (March 16, 1992)
 Transmits Progress Report No. 11.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (April 17, 1992)
 Transmits Progress Report No. 12.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (May 15, 1992)
 Transmits Progress Report No. 13.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (June 15, 1992)
 Transmits Progress Report No. 14.
- 26. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (July 15, 1992) Transmits Progress Report No. 15.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (August 17, 1992)
 Transmits Progress Report No. 16.
- 28. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (September 16, 1992) Transmits Progress Report No. 17.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (October 16, 1992)
 Transmits Progress Report No. 18.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (November 16, 1992)
 Transmits Progress Report No. 19.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (December 15, 1992)
 Transmits Progress Report No. 20.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (January 15, 1993)
 Transmits Progress Report No. 21.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (February 16, 1993)
 Transmits Progress Report No. 22.
- 34. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (March 23, 1993) Transmits Progress Report No. 23.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (April 16, 1993)
 Transmits Progress Report No. 24.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (May 14, 1993)
 Transmits Progress Report No. 25.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (June 15, 1993)
 Transmits Progress Report No. 26.

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3.0 REMEDIAL INVESTIGATION (RI)

3. 4 Work Plans and Progress Reports

- 38. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. (July 16, 1993) Transmits Progress Report No. 27.
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 28. (August 16, 1993)
- Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 29. (September 15, 1993)
- 41. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 30. (October 15, 1993)
- 42. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 31. (November 15, 1993)
- 43. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 32. (December 20, 1993)
- 44. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 33. (January 14, 1994)
- 45. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 34. (February 15, 1994)
- 46. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 35. (March 15, 1994)
- 47. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 36. (April 14, 1994)
- 48. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 37. (May 16, 1994)
- 49. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 38. (June 14, 1994)
- 50. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 39. (July 15, 1994)
- 51. Letter from Erich Zimmerman, Atochem, to Alan Yarbrough, EPA Region IV. Transmits Progress Report No. 40. (August 15, 1994)

3. 8 Interim Deliverables

- 1. Cross Reference: "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama; Volume III, Appendix B; Quality Assurance Project Plan; AOC No. 91-20-C; (Final)," Eckenfelder Inc. for Atochem. (July 1991) [Filed and cited in Entry Number 8 of 3. 4 REMEDIAL INVESTIGATION (RI) Work Plans and Progress Reports]
- Cross Reference: "RI/FS Project Plan; T H Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama; Volume IV Appendix C; Health and Safety Plan; AOC No. 91-20-C; (Final)," Eckenfelder Inc. for Atochem. (July 1991) [Filed and cited in Entry Number 9 of 3. 4 REMEDIAL INVESTIGATION (RI) - Work Plans and Progress Reports]

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3.0 REMEDIAL INVESTIGATION (RI)

3. 8 Interim Deliverables

- 3. Site Analysis; T H Agriculture & Nutrition Company and Pennwalt Corporation; Montgomery, Alabama; Volume 1, EPA Region IV Environmental Photographic Interpretation Center, Warrenton, Virginia. (July 1991) Analysis of aerial photography for period between 1950 and 1986 in support of groundwater contamination assessment.
- 4. Site Analysis; T H Agriculture & Nutrition Company and Pennwalt Corporation; Montgomery, Alabama; Volume 2, EPA Environmental Photographic Interpretation Center, Warrenton, Virginia. (July 1991) Aerial photographs for site analysis.
- T H Agriculture & Nutrition; Montgomery, Alabama; Photographs 14-1 through 14-13, Dynamac Corporation. (March 20, 1992) Color photographs requested by EPA Region IV to clarify site conditions.

3.10 Remedial Investigation (RI) Reports

- Memorandum from Alan Yarbrough, EPA Region IV, to Addressees. (February 10, 1992) Requests review of the Preliminary Site Characterization Summary.
- 2. Letter from John Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. (February 25, 1992) Preliminary review of the Preliminary Site Characterization Summary.
- 3. Letter from John Cleary, T H Agriculture & Nutrition Company, Inc., to Alan Yarbrough, EPA Region IV. (March 09, 1992) Detailed review of the Preliminary Site Characterization Summary.
- 4. Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Atochem. (March 11, 1992)
 Transmits comments to the Preliminary Site Characterization Summary, covering the Phase I data, and listing technical deficiencies to be addressed in the Remedial Investigation Report.
- Memorandum from Kay Wischkaemper, EPA Region IV, to Alan Yarbrough, EPA Region IV. (April 23, 1992) Comments on the Preliminary Site Characterization Summary.
- 6. Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Elf Atochem. (April 29, 1992) Final compiled comments to the Preliminary Site Characterization Summary.
- 7. Letter from Ronald Burt, Eckenfelder, to Alan Yarbrough, EPA Region IV. (May 15, 1992) Responds to EPA Region IV letter dated April 29, 1992, commenting on the Preliminary Site Characterization Summary.
- 8. Letters from Alan Yarbrough, EPA Region IV, to James Martin, Alabama Department of Conservation and Natural Resources; James Lee, US Department of the Interior; Pete Douglas, US Fish and Wildlife Service; and Bennett Bearden, Geological Survey of Alabama. (October 23, 1992) Request review of the draft Remedial Investigation Report.
- Letter from Alan Yarbrough, EPA Region IV, to Joseph Downey, State of Alabama Department of Environmental Management. (October 27, 1992) Requests review of the draft Remedial Investigation Report.
- 10. Letter from James Moore, Geological Survey of Alabama, to Alan Yarbrough, EPA Region IV. (November 12, 1992) Comments on the Remedial Investigation Report.
- Memorandum from Waynon Johnson, National Oceanic and Atmospheric Administration (NOAA), to Alan Yarbrough, EPA Region IV. (November 18, 1992) Comments on the Remedial Investigation Report.

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T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

3.0 REMEDIAL INVESTIGATION (RI)

3.10 Remedial Investigation (RI) Reports

- Letter from John Cleary, T H Agriculture & Nutrition Company, to Alan Yarbrough, EPA Region IV. (November 19, 1992) Comments on the Remedial Investigation Report.
- 13. "Technical Review Comments; Draft Remedial Investigation (RI) Report; T.H. Agriculture and Nutrition; Montgomery, Alabama," PRC. (November 25, 1992) Comments on the Remedial Investigation Report.
- 14. Memorandum from Jonathan Vail, EPA Region IV Environmental Services Division, Athens, Georgia, to Alan Yarbrough, EPA Region IV. (December 07, 1992) Comments on the Remedial Investigation Report.
- 15. Letter from T. Wayne Townsend, Jr., BEI for THAN TAG, to Alan Yarbrough, EPA Region IV. (December 11, 1992) Comments on the Remedial Investigation Report.
- 16. Memorandum from Julie Keller, EPA Region IV, to Alan Yarbrough, EPA Region IV. (December 21, 1992) Comments on the Remedial Investigation Report.
- 17. Memorandum from Winston Smith, EPA Region IV, to Joseph Franzmathes, EPA Region IV. (December 21, 1992) Comments on the Remedial Investigation Report.
- 18. Letter from John Cleary, T H Agriculture & Nutrition Company, to Alan Yarbrough, EPA Region IV. (February 08, 1993) Comments on the Remedial Investigation Report.
- 19. Memorandum from Kay Wischkaemper, EPA Region IV, to Alan Yarbrough, EPA Region IV. (February 11, 1993) Comments on the Remedial Investigation Report.
- Letter from John Cleary, T H Agriculture & Nutrition Company, to Alan Yarbrough, EPA Region IV.
 (March 10, 1993) Comments on the Remedial Investigation Report.
- 21. Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Elf Atochem. (April 21, 1993) Transmits compiled comments to the Remedial Investigation Report.
- 22. Letter from Erich Zimmerman, Elf Atochem, to Alan Yarbrough, EPA Region IV. (May 03, 1993) Requests revised submittal date for the Remedial Investigation Report.
- 23. Letter from Erich Zimmerman, Elf Atochem, to Alan Yarbrough, EPA Region IV. (May 12, 1993) Confirms agenda for May 13, 1993, meeting.
- 24. Remedial Investigation Report; THAN Superfund Site; Montgomery, Alabama, Eckenfelder Inc. for Elf Atochem. (June 1993)
- 25. Remedial Investigation Report; THAN Superfund Site; Montgomery, Alabama; Appendices; Volume 1, Eckenfelder Inc. for Elf Atochem. (June 1993)
- 26. Remedial Investigation Report; THAN Superfund Site; Montgomery, Alabama; Appendices; Volume 2, Eckenfelder Inc. for Elf Atochem. (June 1993)
- 27. Remedial Investigation Report; THAN Superfund Site; Montgomery, Alabama; Eckenfelder Inc. for Elf Atochem. (June 1993) Oversized set of blueprint drawings to accompany the Remedial Investigation Report. This document is shelved separately and is available upon request at the information repository.
- 28. Letter from Alan Yarbrough, EPA Region IV, to John Hornsby, Alabama Department of Conservation and Natural Resources. (July 02, 1993) Transmits copy of Remedial Investigation Report and Elf Atochem proposal for additional sampling (not attached).

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3.0 REMEDIAL INVESTIGATION (RI)

3.10 Remedial Investigation (RI) Reports

- Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Elf Atochem. (July 30, 1993)
 Conditionally approves revised Remedial Investigation Report.
- Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnson & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. (July 20, 1994) Concerning transmittal of "Review and Comments - Revised Remedial Investigation Report" prepared by Bhate Environmental Associates, Inc. for THAN-TAG.

3.11 Health Assessments

- "Preliminary Health Assessment for T H Agriculture & Nutrition Company Proposed (Update 7) Site; Montgomery, Alabama; CERCLIS No. ALD007454085," Agency for Toxic Substances and Disease Registry (ATSDR). (August 08, 1990)
- Letter from Brian J. Hughes, State of Alabama Department of Public Health, to Thomas T. Gallion, Ill, Haskell, Slaughter, Young, Johnson, and Gallion. Concerning ATSDR and ADPH determination that the T H Agriculture Site does not present a public health threat for Lakewood Estates or Grovewood Communities. (October 19, 1994)
- "Public Health Assessment for T.H. Agriculture and Nutrition Montgomery, Montgomery County, Alabama (Public Release)," Agency for Toxic Substances and Disease Registry (ATSDR). (October 20, 1994)

3.12 Endangerment Assessments

 Letter from Joseph Downey, State of Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. (June 16, 1992) Comments on the Baseline Risk Assessment.

4.0 FEASIBILITY STUDY (FS)

4. 2 Sampling and Analysis Data

Letter from Dale Showers, Eckenfelder, to Alan Yarbrough, EPA Region IV. (January 20, 1993)
 Transmits analytical results for soil samples collected according to Treatability Study Work Plan.

4. 4 Work Plans and Progress Reports

- "Draft Treatability Studies Work Plan; THAN Superfund Site; Montgomery, Alabama," Eckenfelder for Elf Atochem. (November 1992)
- 2. Letters from Alan Yarbrough, EPA Region IV, to Joan Mattox, US EPA Risk Reduction Engineering Laboratory, Cincinnati, Ohio, and Joseph Downey, State of Alabama Department of Environmental Management. (November 06, 1992) Request review of the Treatability Study Work Plan.
- Memorandum from Alan Yarbrough, EPA Region IV, to Kay Wischkaemper, EPA Region IV. (November 06, 1992) Requests review of the Treatability Study Work Plan.
- 4. Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Atochem. (December 01, 1992) Approves Draft Treatability Study Work Plan dated November 1992.
- 5. "Draft Bioremediation Treatability Studies Work Plan; THAN Superfund Site; Montgomery, Alabama," Eckenfelder for Elf Atochem. (August 1993)

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4.0 FEASIBILITY STUDY (FS)

4. 4 Work Plans and Progress Reports

 Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Atochem North America. (September 10, 1993) Approves Draft Bioremediation Treatability Studies Work Plan dated August 1993.

4. 8 Interim Deliverables

- 1. Letter from Joseph Downey, State of Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. (June 23, 1992) Concurs with identification of candidate technologies listed in "Identification of Candidate Technologies" Technical Memorandum.
- 2. Technical Memorandum; Identification of Candidate Technologies; T.H. Agriculture & Nutrition Superfund Site and Adjacent Property; Montgomery, Alabama. (July 1992)
- 3. Letter from Alan Yarbrough, EPA Region IV, to Erich Zimmerman, Atochem. (July 22, 1992) Comments on "Identification of Candidate Technologies" Technical Memorandum.
- 4. Letter from Erich Zimmerman, Elf Atochem, to Alan Yarbrough, EPA Region IV. (May 27, 1993) Addendum to "Identification of Candidate Technologies" Technical Memorandum.

4. 9 Feasibility Study (FS) Reports

- Letter from Erich Zimmerman, Elf Atochem North America, Inc., to Alan W. Yarbrough, EPA Region IV. (June 13, 1994) Concerning enclosed copy of the Draft Focused Feasibility Study Report Addendum for Groundwater Operable Unit.
- 2. Focused Feasibility Study Report for Groundwater Operable Unit THAN Superfund Site, Eckenfelder Inc. for Elf Atochem North America, Inc. (August 1994)
- Letter from Justin Martindale, Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. (October 05, 1994) Concerning comments on the Final Feasibility Study.
- 4. Letter from Alan W. Yarbrough, EPA Region IV, to Erich Zimmerman, Elf. Atochem North America, Inc. (November 07, 1994) Concerning EPA approval of the Focused Feasibility Study.
- Letter from Doug Loutzenhiser, Elf Atochem North America, Inc., to Alan Yarbrough, EPA Region IV. (November 11, 1994) Concerning revised cost summary for alternative number 5A - Discharge to the Towassa POTW.
- 6. Letter from Margaret E. Dew, Bhate Environmental Associates for THAN-TAG Inc., to Alan Yarbrough, EPA Region IV. (February 08, 1995) Concerning comments on the Proposed Plan for Interim Remedial Action and the Draft Focused Feasibility Study Report for Groundwater Operable Unit dated May 12, 1994.
- 7. Letter from Todd Slater, Elf Atochem North America, Inc., to Alan Yarbrough, EPA Region IV. Concerning response to the letter dated February 8, 1995 from Bhate Environmental Associates. (March 21, 1995)

4.10 Proposed Plans for Selected Remedial Action

1. Letter from Justin Martindale, Alabama Department of Environmental Management, to Alan W. Yarbrough, EPA Region IV. Concerning comments on the Proposed Plan and ADEM's agreement with the EPA preferred Alternative 4. (October 26, 1994)

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4.0 FEASIBILITY STUDY (FS)

4.10 Proposed Plans for Selected Remedial Action

- Letter from James L. Bryant, Alabama Department of Environmental Management, to Arthur Collins, EPA Region IV. Concerning ADEM's recommendation that the the option for discharge to the POTW be included as an alternative should the preferred option not be feasible. (November 07, 1994)
- 3. Letter from Doug Loutzenhiser, Elf Atochem North America, Inc., to Alan Yarbrough, EPA Region IV. Concerning attached description of and revised cost estimate for Alternative No. 5A, On-site Extraction of Groundwater and Treatment at the Towassa POTW. (November 30, 1994)
- "Superfund Proposed Plan for Interim Remedial Action, T H Agriculture & Nutrition Site," EPA Region IV. (December 1994)
- 5. Letter from Justin Martindale, Alabama Department of Environmental Management, to Alan W. Yarbrough, EPA Region IV. Concerning ADEM's concurrence with the EPA preferred Alternative 4, Pump and Treat with Discharge of Water on Site to the local POTW. (December 06, 1994)
- Letter from Margaret E. Dew, Bhate Environmental Associates for THAN-TAG Inc., to Alan Yarbrough, EPA Region IV. Concerning request for an extension of the Public Comment Period for the Proposed Plan. (December 29, 1994)
- 7. Letter from Katherine L. Rhyne, King & Spalding (Attorney for Elf Atochem), to Andrea Madigan and Alan Yarbrough, EPA Region IV. Concerning request for an extension of the Public Comment Period for the Proposed Plan. (December 30, 1994)
- Letter from Doug Loutzenhiser, Elf Atochem North America, Inc., to Alan Yarbrough, EPA Region
 Concerning comments on the Proposed Plan for Interim Remedial Action. (February 06, 1995)
- Cross Reference: Letter from Margaret E. Dew, Bhate Environmental Associates for THAN-TAG Inc., to Alan Yarbrough, EPA Region IV. (February 08, 1995) Concerning comments on the Proposed Plan for Interim Remedial Action and the Draft Focused Feasibility Study Report for Groundwater Operable Unit dated May 12, 1994. [Filed and cited in Entry Number 6 of 4. 9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
- Cross Reference: Letter from Todd Slater, Elf Atochem North America, Inc., to Alan Yarbrough, EPA Region IV. Concerning response to the letter dated February 8, 1995 from Bhate Environmental Associates. (March 21, 1995) [Filed and cited in Entry Number 7 of 4. 9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]

5.0 RECORD OF DECISION (ROD)

- Cross-Reference: A Concurrence Letter from Neil Daniell, State of Alabama Department of Public Health, to Alan Yarbrough, EPA Region IV. (April 17, 1995) [Filed and cited in Appendix B in entry number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].
- Cross-Reference: Concurrence Letter from James W. Warr, Alabama Department of Environmental Management, to Richard D. Green, EPA Region IV. (April 17, 1995) [Filed and cited in Appendix B in entry number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].

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5.0 RECORD OF DECISION (ROD)

5. 2 Responsiveness Summaries

 Cross-Reference: Responsiveness Summary. (April 17, 1995) [Filed and cited in Appendix A in entry number 1 in 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].

5. 9 Record of Decision (ROD)

 "Interim Action, Record of Decision, Summary of Remedial Alternative Selection," EPA Region IV. (April 17, 1995)

10.0 ENFORCEMENT

10.11 EPA Administrative Orders

- "Administrative Order by Consent for Remedial Investigation/ Feasibility Study IN THE MATTER
 OF: T H Agriculture & Nutrition Site, Montgomery, Alabama; Atochem, Industrial Chemicals, Inc.,
 and Astro Packaging, Inc., Respondents; EPA Docket No. 91-20-C." (March 26, 1991)
- 2. "Amendment to Administrative Order by Consent IN THE MATTER OF: T H Agriculture & Nutrition Site, Montgomery, Alabama; Elf Atochem North America, Inc., f/k/a Atochem North America, Inc., Industrial Chemicals, Inc., and Astro Packaging, Inc., Respondents. (June 24, 1992)
- 3. "Second Amendment to Administrative Order by Consent IN THE MATTER OF: T H Agriculture & Nutrition Site, Montgomery, Alabama; Elf Atochem North America, Inc., f/k/a/ Atochem North America, Inc., Industrial Chemicals, Inc., and Astro Packaging, Inc., Respondents; EPA Docket No. 91-20-C." (July 13, 1994)

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11. 1 General and Contractor-Related Correspondence

- Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. Concerning transmittal of depositions of former employees and others associated with the THAN Superfund Site [depositions not attached]. (July 18, 1994)
- 2. Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. Concerning transmittal of sampling and analysis data from surrounding areas of the THAN Superfund Site. (September 19, 1994)
- 3. Letter from Justin Martindale, Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. Concerning request for interpretation of results from sampling event in the vicinity of the THAN NPL site. (September 20, 1994)
- 4. Letter from Barry D. Woodham, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Neal Daniel, Alabama Department of Public Health. Concerning transmittal of Sampling and Analysis Data in the matter of Twin Lakes Community, Inc. et al. v. Elf Atochem North America, et al. (September 21, 1994)
- Letter from Katherine L. Rhyne, King & Spalding (Attorney for Elf Atochem North America), to Andrea Madigan, EPA Region IV; Alan W. Yarbrough, EPA Region IV; J. Neil Daniell, Alabama Department of Public Health; Justin Martindale, Alabama Department of Environmental Management. Concerning transmittal of cleanup standards for Dioxin used in EPA Records of Decision. (September 26, 1994)

Administrative Record Index for the T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

11.0 POTENTIALLY RESPONSIBLE PARTIES (PRP)

11. 1 General and Contractor-Related Correspondence

- Letter from Stephen Rahaim, King & Spalding (Attorney for Elf Atochem North America), to Alan Yarbrough, EPA Region IV. Concerning transmittal of analytical data compiled by T. Wayne Townsend, the plaintiffs' expert witness. (September 27, 1994)
- 7. Letter from Alan W. Yarbrough, EPA Region IV, to Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.). Concerning EPA's review of the dioxin data which indicates that the levels of dioxin found in the samples does not exceed background levels. (September 29, 1994)
- 8. Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan W. Yarbrough, EPA Region IV. Concerning reaction to the letter dated September 29, 1994. (October 03, 1994)

11. 9 PRP-Specific Correspondence

- 1. "Groundwater at the THAN Superfund Site," Elf Atochem North America. (DATE UNKNOWN)
- Cross Reference: Letter from Katherine L. Rhyne, King & Spalding (Attorney for Elf Atochem North America), to Andrea Madigan, EPA Region IV; Alan W. Yarbrough, EPA Region IV; J. Neil Daniell, Alabama Department of Public Health; Justin Martindale, Alabama Department of Environmental Management. Concerning transmittal of cleanup standards for Dioxin used in EPA Records of Decision. (September 26, 1994) [Filed and cited in Entry Number 5 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) - General and Contractor-Related Correspondence]
- Cross Reference: Letter from Stephen Rahaim, King & Spalding (Attorney for Elf Atochem North America), to Alan Yarbrough, EPA Region IV. Concerning transmittal of analytical data compiled by T. Wayne Townsend, the plaintiffs' expert witness. (September 27, 1994) [Filed and cited in Entry Number 6 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) - General and Contractor-Related Correspondence]

13.0 COMMUNITY RELATIONS

- 1. Letter from Alan Yarbrough, EPA Region IV, to Mary Thornton, Dominick, Fletcher, Yeilding, Wood & Lloyd. (July 09, 1992) Transmits copy of Administrative Order by Consent [not attached].
- Letter from Charles Eger, EPA Region IV, to Bill Welch, Industrial Chemical. (August 04, 1992) Concerning potential problems noted during site inspection made July 15, 1992.
- 3. Letter from Alan Yarbrough, EPA Region IV, to H. Houghton Smith, Twin Lakes Community, Inc. (August 14, 1992) Transmits sampling data [not attached].
- 4. Letter from Alan Yarbrough, EPA Region IV, to H. Houghton Smith, Twin Lakes Community, Inc. (October 23, 1992) Transmits draft copy of revised Remedial Investigation Report [not attached].
- 5. Letter from Alan Yarbrough, EPA Region IV, to Kathy Salser, Housing & Urban Development. (October 28, 1992) Transmits information from Remedial Investigation Report [not attached].
- Letter from Alan Yarbrough, EPA Region IV, to H. Houghton Smith, Twin Lakes Community, Inc. (November 18, 1992) Transmits draft copy of the Treatability Study Work Plan [not attached] and responds to request for copy of Administrative Record.

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13.0 COMMUNITY RELATIONS

- 7. Letter from Alan Yarbrough, EPA Region IV, to Betty Tice, Citizen. (May 17, 1993) Provides requested information concerning sampling locations and results.
- 8. Letters from Alan Yarbrough, EPA Region IV, to Eddie Barrett, Citizen, and H. Houghton Smith, Twin Lakes Community, Inc. (July 02, 1993) Transmits draft copy of revised Remedial Investigation Report [not attached].
- Letter from Alan Yarbrough, EPA Region IV, to Leila Brewer, Victorian Classics. (July 23, 1993)
 Transmits requested information [not attached].
- 10. Cross Reference: Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. Concerning transmittal of depositions of former employees and others associated with the THAN Superfund Site [depositions not attached]. (July 18, 1994) [Filed and cited in Entry Number 1 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]
- 11. Cross Reference: Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. Concerning transmittal of sampling and analysis data from surrounding areas of the THAN Superfund Site. (September 19, 1994) [Filed and cited in Entry Number 2 of 11.1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]
- 12. Cross Reference: Letter from Justin Martindale, Alabama Department of Environmental Management, to Alan Yarbrough, EPA Region IV. Concerning request for interpretation of results from sampling event in the vicinity of the THAN NPL site. (September 20, 1994) [Filed and cited in Entry Number 3 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]
- 13. Cross Reference: Letter from Barry D. Woodham, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Neal Daniel, Alabama Department of Public Health. Concerning transmittal of Sampling and Analysis Data in the matter of Twin Lakes Community, Inc. et al. v. Elf Atochem North America, et al. (September 21, 1994) [Filed and cited in Entry Number 4 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]
- 14. Cross-Reference: Letter from Katherine L. Rhyne, King & Spalding (Attorney for Elf Atochem Nroth America), to Andrea Madigan, EPA Region IV; Alan W. Yarbrough, EPA Region IV; J Neil Daniell, Alabama Department of Public Health; Justin Martindale, Alabama Department of Environmental Management. Concerning transmittal of cleanup standards for Dioxin used in EPA Records of Decision. (September 26, 1994) [Filed and cited in entry number 5 of 11.1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence].
- 15. Cross-Reference: Letter from Stephen Rahaim, King & Spalding (Attorney for Elf Atochem North America), to Alan Yarbrough, EPA Region IV. Concerning transmittal of analytical data compiled by T. Wayne Townsend, the plaintiffs' expert witness. (September 27, 1994) [Filed and cited in entry number 6 in 11.1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence].

Administrative Record Index for the T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

13.0 COMMUNITY RELATIONS

13. 1 Correspondence

- 16. Cross Reference: Letter from Alan W. Yarbrough, EPA Region IV, to Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.). Concerning EPA's review of the dioxin data which indicates that the levels of dioxin found in the samples does not exceed background levels. (September 29, 1994) [Filed and cited in Entry Number 7 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]
- 17. Cross Reference: Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnston & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan W. Yarbrough, EPA Region IV. Concerning reaction to the letter dated September 29, 1994. (October 03, 1994) [Filed and cited in Entry Number 8 of 11. 1 POTENTIALLY RESPONSIBLE PARTIES (PRP) General and Contractor-Related Correspondence]

13. 6 Community Relations Plans

1. "Final Community Relations Plan; T H Agriculture & Nutrition Company Superfund Site; Montgomery, Montgomery County, Alabama," EPA Region IV. (August 1991)

13. 7 News Clippings and Press Releases

- "EPA Information Meeting: T H Agriculture & Nutrition Superfund Site; Montgomery, Montgomery County, Alabama," EPA Region IV. (March 10, 1992) Concerning announcement of public meeting to present findings from the first phase of the Remedial Investigation to be held March 24, 1992.
- 2. "Water tests show DDT" Montgomery Advertiser Montgomery, AL. (March 25, 1992)
- "EPA: Ground water tainted beyond Superfund site" Montgomery Advertiser Montgomery, AL. (June 23, 1993)
- 4. "Tainted site may harm wildlife, expert says" Montgomery Advertiser Montgomery, AL. (September 15, 1993)

13. 8 Public Meetings

- 1. Public Notice, "EPA Public Meeting / Comment Period." EPA Region IV. (December 08, 1994)
- 2. Public Transcript, Proposed Interim Action Plan Meeting. (December 12, 1994)
- 3. Public Notice, "EPA Comment Period Extension," EPA Region IV. (January 1995)

13. 9 Fact Sheets

1. "U. S. Environmental Protection Agency - Region IV; Superfund Fact Sheet; T H Agriculture & Nutrition Superfund Site; Montgomery, Montgomery County, Alabama," EPA Region IV. (August 1991) Provides background information and outlines remedial work to be performed.

13.10 Technical Assistance Grants

 "Superfund Response Alert: Montgomery, AL; Technical Assistance Grant (TAG) Awarded at the T.H. Agriculture and Nutrition Site," EPA Region IV. (October 08, 1992)

Administrative Record Index for the T.H. AGRICULTURE & NUTRITION (MONTGOMERY) NPL Site (Operable Unit #1)

13.0 COMMUNITY RELATIONS

13.10 Technical Assistance Grants

- Cross Reference: Letter from Thomas T. Gallion, III, Haskell Slaughter Young Johnson & Gallion (Attorney for Twin Lakes Community, Inc.), to Alan Yarbrough, EPA Region IV. (July 20, 1994) Concerning transmittal of "Review and Comments - Revised Remedial Investigation Report" prepared by Bhate Environmental Associates, Inc. for THAN-TAG. [Filed and cited in Entry Number 30 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
- Letter from Margaret E. Dew, Bhate Environmental Associates, Inc., to THAN-TAG, Inc. Coalition. Concerning transmittal of monthly progress reports from December 1993 to July 1994. (August 17, 1994)
- "THAN-TAG, Inc. Quarterly Progress Report" Bhate Engineering. (September 14, 1994)
- Cross Reference: Letter from Margaret E. Dew, Bhate Environmental Associates for THAN-TAG Inc., to Alan Yarbrough, EPA Region IV. Concerning request for an extension of the Public Comment Period for the Proposed Plan. (December 29, 1994) [Filed and cited in Entry Number 6 of 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
- Cross-Reference: Letter from Margaret E. Dew, Bhate Environmental Associates for THAN-TAG Inc., to Alan Yarbrough, EPA Region IV. Concerning comments on the Proposed Plan for Interim Remedial Action and the Draft Focused Feasibility Study Report for Groundwater Operable Unit dated May 12, 1994. (February 08, 1995) [Filed and cited as entry number 6 in 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports].

16.0 NATURAL RESOURCE TRUSTEE

16. 1 Correspondence

 Cross Reference: Letter from James Lee, US Department of the Interior, to Alan Yarbrough, EPA Region IV. (May 21, 1993) Concerning site visit planned for June 8, 1993. [Filed and cited in Entry Number 7 of 3. 1 REMEDIAL INVESTIGATION (RI) - Correspondence]

17.0 SITE MANAGEMENT RECORDS

17. 4 Site Audio-Visuals

- Cross Reference: Site Analysis; T H Agriculture & Nutrition Company and Pennwalt Corporation; Montgomery, Alabama; Volume 2, EPA Environmental Photographic Interpretation Center, Warrenton, Virginia. (July 1991) Aerial photographs for site analysis. [Filed and cited in Entry Number 4 of 3.8 REMEDIAL INVESTIGATION (RI) - Interim Deliverables]
- Cross Reference: T H Agriculture & Nutrition; Montgomery, Alabama; Photographs 14-1 through 14-13, Dynamac Corporation. (March 20, 1992) Color photographs requested by EPA Region IV to clarify site conditions. [Filed and cited in Entry Number 5 of 3. 8 REMEDIAL INVESTIGATION (RI) - Interim Deliverables]

17. 8 State and Local Technical Records

 "Potential Off-Site Sources; 3405 Birmingham Highway (Formerly 3015 Birmingham Highway); Montgomery, Alabama," Golder Associates. (April 1990) Investigation of the Industrial Chemicals (IC) property upgradient of the Pennwalt portion of the T H Agriculture & Nutrition Company, Inc., Site, concluding that IC's groundwater is being impacted by pollution from the Pennwalt property.